

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE AKORN, INC. SECURITIES
LITIGATION

Case No. 15 C 01944

Honorable Gary Feinerman

November 28, 2017 Presentment Date

**CLASS PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

Lead Plaintiff Akorn Investor Group (consisting of proposed Class Plaintiffs Mikolaj Sarzynski, J. M. Cunniff Jr., and Elizabeth Cunniff) (collectively, the "Class Plaintiffs"), individually and on behalf of themselves and all others similarly situated, move this Court for preliminary approval of the proposed Settlement and notice to the Settlement Class on their claims that Defendants violated the Securities Exchange Act of 1934. As is more fully set forth in the Memorandum of Law filed herewith, Class Plaintiffs state as follows:

1. The proposed Settlement meets the standards for preliminary approval;
2. Certification of the proposed Class is appropriate;
3. The proposed notice program is appropriate; and
4. Defendants do not oppose the relief sought herein.

WHEREFORE, Class Plaintiffs respectfully request that the Court enter the Parties' agreed-upon Order Preliminarily Approving Settlement and Notice to the Class attached to the Stipulation of Settlement dated November 17, 2017 as Exhibit A (*see* Appendix 1 filed herewith)

and submitted in accordance with the Court's case management procedures.

Dated: November 20, 2017

Respectfully submitted,

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/s/Patrick V. Dahlstrom

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